

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CISA A MACK (A/K/A CISA MACK-BRACEY), :

Plaintiff, :

-against- :

JPMORGAN CHASE & CO. (Individually and as
Parent Employer Corporation, hereinafter "CHASE
& CO"), et al., :

Defendants. :

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ECF Case

12 Civ. 8181 (DAB) (KNF)

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the attached Defendant's Rule 56.1 Statement (Statement of Material Facts) dated October 14, 2014 pursuant to Rule 56.1 of the Local Rules of the Southern and Eastern Districts of New York, the attached Declaration of Elena D. Marcuss and all accompanying exhibits, the attached Declaration of Jose Jimenez and all accompanying exhibits, the attached Declaration of Augustin Velasco and all accompanying exhibits, the accompanying Memorandum of Law in Support of Defendant's Motion for Summary Judgment dated October 14, 2014, and on all prior pleadings and proceedings in this case, Defendant JPMorgan Chase Bank, N.A., will move the Court, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York, 500 Pearl St. New York, New York 10007, on the 14th day of October, 2014, or as soon thereafter as Counsel can be heard, for an Order pursuant to Fed. R. Civ. P. 56 and Local Rule 56.1 granting Defendant's motion for summary judgment and for such other, further or different relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Order entered by the Court dated August, 28, 2014, Plaintiff shall serve and file her opposition papers by no later than

November, 28, 2014. Defendant shall serve and file its reply papers by no later than December 8, 2014.

Dated: October 14, 2014
New York, New York

McGUIREWOODS LLP

By: /s/ Philip A. Goldstein
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